

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

BRANDON SANTANOO,

Defendant.

X

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X

CONSENT PRELIMINARY ORDER  
OF FORFEITURE/  
MONEY JUDGMENT

24 Cr. 247 (RMB)

WHEREAS, on or about April 22, 2024, BRANDON SANTANOO (the "Defendant"), was charged in an Information, 24 Cr. 247 (RMB) (the "Information"), with conspiracy to commit bank fraud, in violation of Title 18, United States Code, Section 1349 (Count One);

WHEREAS, the Information included a forfeiture allegation as to Count One of the Information, seeking forfeiture to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(A), of any and all property constituting, or derived from, proceeds the Defendant obtained directly or indirectly, as a result of the commission of the offense alleged in Count One of the Information, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of the offense alleged in Count One of the Information;

WHEREAS, on or about April 22, 2024, the Defendant pled guilty to Count One of the Information, pursuant to a plea agreement with the Government, wherein the Defendant admitted the forfeiture allegation with respect to Count One of the Information and agreed to forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(A), a sum of money equal to \$623,546.49 in United States currency, representing the

amount of proceeds traceable to the commission of the offense alleged in Count One of the Information;

WHEREAS, the Defendant consents to the entry of a money judgment in the amount of \$623,546.49 in United States currency representing the amount of proceeds traceable to the offense charged in Count One of the Information that the Defendant personally obtained, for which the Defendant will be jointly and severally liable with any unindicted co-conspirators for the conduct alleged in Count One of the Information (the "Co-Conspirators"), to the extent forfeiture money judgments are ultimately entered against the Co-Conspirators; and

WHEREAS, the Defendant admits that, as a result of acts and/or omissions of the Defendant, the proceeds traceable to the offense alleged in Count One of the Information that the Defendant personally obtained cannot be located upon the exercise of due diligence.

IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, by its attorney Damian Williams, United States Attorney, Assistant United States Attorney, Stephanie Simon of counsel, and the Defendant, and his counsel, Jeffrey Chabrowe, Esq., that:

1. As a result of the offense charged in Count One of the Information, to which the Defendant pled guilty, a money judgment in the amount of \$623,546.49 in United States currency (the "Money Judgment"), representing the amount of proceeds traceable to the offense charged in Count One of the Information that the Defendant personally obtained, for which the Defendant will be jointly and severally liable with any Co-Conspirators for the conduct charged in Count One of the Information, to the extent forfeiture money judgments are ultimately entered against the Co-Conspirators, shall be entered against the Defendant.

2. Pursuant to Rule 32.2(b)(4) of the Federal Rules of Criminal Procedure, this Consent Preliminary Order of Forfeiture/Money Judgment is final as to the Defendant, BRANDON SANTANOO, and shall be deemed part of the sentence of the Defendant, and shall be included in the judgment of conviction therewith.

3. All payments on the outstanding money judgment shall be made by postal money order, bank or certified check, made payable, in this instance, to the United States Marshals Service, and delivered by mail to the United States Attorney's Office, Southern District of New York, Attn: Illicit Finance and Money Laundering Unit, 26 Federal Plaza, 38<sup>th</sup> Floor, New York, NY 10278 and shall indicate the Defendant's name and case number.

4. The United States Marshals Service is authorized to deposit the payments on the Money Judgment in the Assets Forfeiture Fund, and the United States shall have clear title to such forfeited property.

5. Pursuant to Title 21, United States Code, Section 853(p), the United States is authorized to seek forfeiture of substitute assets of the Defendant up to the uncollected amount of the Money Judgment.

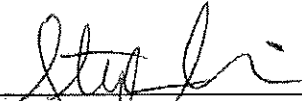
6. Pursuant to Rule 32.2(b)(3) of the Federal Rules of Criminal Procedure, the United States Attorney's Office is authorized to conduct any discovery needed to identify, locate or dispose of forfeitable property, including depositions, interrogatories, requests for production of documents and the issuance of subpoenas.

7. The Court shall retain jurisdiction to enforce this Consent Preliminary Order of Forfeiture/Money Judgment, and to amend it as necessary, pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure.

8. The signature page of this Consent Preliminary Order of Forfeiture/Money Judgment may be executed in one or more counterparts, each of which will be deemed an original but all of which together will constitute one and the same instrument.

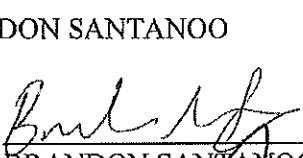
AGREED AND CONSENTED TO:

DAMIAN WILLIAMS  
United States Attorney for the  
Southern District of New York

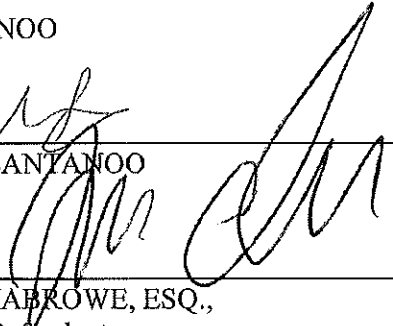
By:   
STEPHANIE SIMON  
Assistant United States Attorney  
26 Federal Plaza, 37<sup>th</sup> Floor  
New York, NY 10278  
(212) 637-2581

4/22/24  
DATE

BRANDON SANTANOO


By:   
BRANDON SANTANOO

4.22.24  
DATE

By:   
JEFFREY CHABROWE, ESQ.,  
Attorney for Defendant  
Law Office of Jeffrey Chabrowe  
521 Fifth Avenue, 17<sup>th</sup> Floor  
New York, NY 10175

4.22.24  
DATE

SO ORDERED:

  
HONORABLE  
UNITED STATES DISTRICT JUDGE

5/14/24  
DATE